

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

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CURTIS REED,

Plaintiff,

Case No. 13-CV-852-C

-against-

TAKHAR COLLECTION SERVICES, LTD.,

Defendant.

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To: **MICHAEL J. ROEMER, CLERK**
UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

REQUEST FOR CLERK'S CERTIFICATE OF DEFAULT

In accordance with Fed. R. Civ. P. 55(a), I request that a Clerk's Certificate of Default be entered against Defendant, Takhar Collection Services, for failure to plead or otherwise defend in this action as it fully appears from the court file herein and from the attached Attorney Affirmation of Fredrick Schulman, Esq., counsel with Fredrick Schulman & Associates, attorneys for Plaintiff, Curtis Reed.

Date: New York, New York
December 20, 2013

By: s/ Fredrick Schulman
Fredrick Schulman, Esq.
Fredrick Schulman & Associates
30 East 29th Street
New York, New York 10016
(212) 796-6053
info@fschulmanlaw.com
Attorneys for the Plaintiff

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

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**AFFIRMATION IN SUPPORT OF REQUEST
FOR CLERK'S CERTIFICATE OF DEFAULT**

Fredrick Schulman, Esq., being duly sworn, deposes and says:

I am an attorney with the firm Fredrick Schulman & Associates, attorneys for Plaintiff, Curtis Reed, and as such, am fully familiar with the facts and circumstances stated herein.

2. This action was commenced pursuant to 15 U.S.C. Sec. 1692, *et. seq.*, the Fair Debt Collection Practices Act.

3. Defendant, Takhar Collection Services, Ltd., was served with a copy of the Summons and Complaint on November 18, 2013. A copy of the Complaint is attached hereto as Exhibit "A". A copy of the Affidavit of Service, previously filed via ECF, is also attached hereto as Exhibit "B".

4. The time for Defendant, Takhar Collection Services, Ltd., to answer or otherwise move with respect to the Complaint herein has expired.

5. Defendants, Takhar Collection Services, Ltd., has not answered or otherwise moved with respect to the Complaint and the time for the Defendants to answer or otherwise move with respect to the Complaint has not been extended.

6. Defendant, Takhar Collection Services, Ltd., is indebted to Plaintiff Curtis Reed for, amongst other things, violations of the Fair Debt Collection Practices Act, Pursuant to 15 U.S.C. Sec. 1692, et seq.,

WHEREFORE, Plaintiff, Curtis Reed requests through his attorneys that the default of Defendant, Takhar Collection Services, Ltd., be noted and a Certificate of Default be issued.

Dated: New York, New York
December 20, 2013

By: s/ Fredrick Schulman
Fredrick Schulman, Esq.
Fredrick Schulman & Associates
30 East 29th Street
New York, New York 10016
(212) 796-6053
jscheiner@fschulmanlaw.com
Attorneys for the Plaintiff

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

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CURTIS REED,

Plaintiff,

Case No. 13-CV-852-C

-against-

TAKHAR COLLECTION SERVICES, LTD.,

CLERK'S CERTIFICATE

Defendant.

-----X

I, MICHAEL J. ROEMER, Clerk of the United States District Court for the Western District of New York, do hereby certify that Defendant, Takhar Collection Services, Ltd., has not filed an Answer or otherwise moved with respect to the Complaint herein. The default of Defendant, Takhar Collection Services, Ltd., is hereby noted pursuant to Fed. R. Civ. P. 55(a).

Dated: Buffalo, New York

_____, 20__

MICHAEL J. ROEMER
Clerk of the Court

By:_____
Deputy Clerk